

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

**UNOPPOSED MOTION OF WILMINGTON TRUST COMPANY
FOR LEAVE TO FILE SUGGESTIONS IN SUPPORT OF MOTION FOR SUMMARY
JUDGMENT IN EXCESS OF PAGE LIMITATION**

Defendant Wilmington Trust Company (“Wilmington”) respectfully moves this Court for leave to file its Suggestions in Support of its Motion for Summary Judgment in excess of the page limit set forth in Local Rule 7.0(f). In support of this request, which is unopposed, Wilmington states as follows:

1. Local Rule 7.0(f) permits a party to file suggestions in support to motions in excess of fifteen (15) pages with “permission of the Court.” Pursuant to that Rule, Wilmington seeks leave to file its Suggestions in Support of its Motion for Summary Judgment (“Motion”) in excess of the fifteen (15) page limit contained in Local Rule 7.0(f).

2. Wilmington submits that good cause exists for this request. This case is complex, 12 years old and substantial discovery has occurred since this case was filed. Wilmington possesses numerous grounds for seeking summary judgment.

3. Wilmington accordingly requests leave to file its Suggestions in Support of its Motion for Summary Judgment that do not exceed thirty (30) pages in length. Wilmington is

still in the process of preparing its Suggestions, and its brief may be shorter than the thirty (30) pages which they have requested.

4. This motion is not made for the purpose of delay or harassment, and no party will be prejudiced if the motion is granted.

5. Wilmington has contacted counsel for Plaintiffs, who do not oppose the requested relief.

WHEREFORE, Wilmington respectfully requests the Court grant them leave to file its Suggestions in Support of its Motion for Summary Judgment of up to thirty (30) pages in length.

Respectfully submitted,

/s/ Mark A. Olthoff

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ATTORNEYS WILMINGTON TRUST
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was filed electronically with the above-captioned court, with notice of case activity to be generated and sent electronically by the Clerk of said court (with a copy to be mailed to any individuals who do not receive electronic notice from the Clerk) this 23rd day of August 2012, to all counsel of record.

/s/ Mark A. Olthoff

Attorney for Wilmington Trust Company